

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

**NOTICE OF MOTION**

WIGBERTO VIERA,  
LOUIE SANTIAGO, and  
ERNESTO COLON,

14 Cr. 083 (ER)

DEFENDANTS.

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Please take notice, that upon the annexed declaration of John A. Diaz, Esq., and the attached exhibits and memorandum of law, the undersigned will move this Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a time to be designated by the Court, for an order, pursuant to the Fifth Amendment of the United States Constitution and Local Criminal Rule 16.1, compelling the Government to produce certain discovery items, and granting such further relief as the Court deems just and proper.

Dated: New York, New York  
April 21, 2015

Respectfully submitted,

/s/ John A. Diaz

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